

WEIL, GOTSHAL & MANGES LLP
1 Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
2 Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
3 Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
4 767 Fifth Avenue
5 New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
7 Jane Kim (#298192)
(jkim@kbkllp.com)
8 David A. Taylor (#247433)
(dtaylor@kbkllp.com)
9 Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
10 650 California Street, Suite 1900
11 San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

13 *Attorneys for Debtors and Reorganized Debtors*

14
15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 **In re:**

Bankruptcy Case No. 19-30088 (DM)

19 **PG&E CORPORATION,**

Chapter 11

20 **- and -**

(Lead Case) (Jointly Administered)

21 **PACIFIC GAS AND ELECTRIC**
22 **COMPANY,**

Debtors. **DECLARATION OF RICHARD W. SLACK IN FURTHER SUPPORT OF REORGANIZED DEBTORS' TWENTY-FIRST SECURITIES CLAIMS OMNIBUS OBJECTION (DUPLICATE CLAIMS) RELATING TO CLAIM OF WILLIAM MCGOVERN IRA CHARLES SCHWAB CUSTODIAN**

23 Affects PG&E Corporation
24 Affects Pacific Gas and Electric
Company
25 Affects both Debtors

[Related to Docket Nos. 12149, 12398]

26 * *All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Date: June 29, 2022
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 Pursuant to 28 U.S.C. § 1746, I, Richard W. Slack, hereby declare under penalty of perjury and
2 state as follows:

3 1. I am a member of Weil, Gotshal & Manges LLP, counsel for the debtors and reorganized
4 debtors in the above-captioned action (collectively, the “**Reorganized Debtors**”). I am admitted to this
5 Court *pro hac vice* and respectfully submit this declaration in further support of the *Reorganized
6 Debtors’ Twenty-First Securities Claims Omnibus Objection (Duplicate Claims)*, dated April 12, 2022
7 [Docket No. 12149] (the “**Objection**”).

8 2. Attached as **Exhibit A** is a true and correct copy of Claim No. 104029, received from
9 William McGovern IRA Charles Schwab Custodian (the “**Claimant**”) on May 7, 2020.

10 3. Attached as **Exhibit B** is a true and correct copy of Claim No. 104651 (together with
11 Claim No. 104029, the “**McGovern Claims**”), received from the Claimant on May 14, 2020.

12 4. Attached as **Exhibit C** is a true and correct copy of a statement submitted by Diana
13 Harrison, CPA, to the Reorganized Debtors’ claims administrator, Kroll Restructuring Administration
14 LLC (formerly known as Prime Clerk LLC), dated September 12, 2021.

15 5. Attached as **Exhibit D** is a true and correct copy of the informal responses submitted on
16 behalf of the Claimant dated April 14, 2022 and May 1, 2022.

17 6. Attached as **Exhibit E** is a true and correct copy of the Reorganized Debtors’
18 communications with Diana Harrison, CPA, who filed the McGovern Claims on behalf of the Claimant,
19 dated May 10, 2022.

20 7. Attached as **Exhibit F** is a true and correct copy of follow-up emails, dated May 13, 2022
21 through May 24, 2022, by the Reorganized Debtors to representatives of the Claimant, including Ms.
22 Harrison.

Executed: June 22, 2022

New York, New York

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack
Richard W. Slack

Attorneys for Debtors and Reorganized Debtors